

## Brian Quiros

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**From:** Tisa, Kimberly  
**Sent:** Wednesday, September 20, 2017 9:41 AM  
**To:** 'Mike Zarba'  
**Cc:** Doubleday, Edward; Trombly, Gary  
**Subject:** RE: CEC - Structural Steel Decontamination and Recycling  
**Attachments:** 021200 Select Demo PCB Remediation Century Enterprise - Rev 7.pdf

Mike:

Based on EPA's review, please confirm that in addition to the paint sampling to be conducted during disassembly/decon of the steel (as outlined in the May 24, 2017 response), wipe samples will also be collected in accordance with November 2016 steel decon/sampling plan. I believe the above attached is the most recent version that we have.

Given the proposed plan for disassembly/decon as described in the May 24, 2017 Response to EPA comments, would this require a change to the steel/decon plan as presented in the November 2016 submittal?

Kimberly N. Tisa, PCB Coordinator  
USEPA  
5 Post Office Square, Suite 100  
Boston, MA 02109-3912

617.918.1527 (phone)  
617.918.0527 (fax)  
[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)

**From:** Mike Zarba [mailto:mzarba@newmilford.org]  
**Sent:** Monday, September 18, 2017 2:22 PM  
**To:** Tisa, Kimberly <Tisa.Kimberly@epa.gov>  
**Cc:** Doubleday, Edward <EDoubleday@trcsolutions.com>; Trombly, Gary <Gary.Trombly@ct.gov>  
**Subject:** Re: CEC - Structural Steel Decontamination and Recycling  
Mik  
Kim:

I believe we responded to this question in my Aug 4, 2017 e-mail response, in which we provided a "condensed" attachment of only 9 pages. Can you please refer to that e-mail and attachment and let me know if it answers your question?

Thank You,

*Michael F. Zarba, P.E.*

Public Works Director  
Town of New Milford  
(860) 355-6040 ext. 3247 phone  
(860) 355-6055 fax  
[www.newmilford.org/DPW](http://www.newmilford.org/DPW)

On Mon, Sep 18, 2017 at 11:57 AM, Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)> wrote:

Mike:

Just a quick question as I go through all information provided. In the May 4 2017 Response to EPA comments, the EMSL QC information was provided as Attachment 2.

When I just revisited this data, I identified that method 3550 was used for extraction of wipe samples. As you know this extraction method is not considered to be effective/efficient for extraction of PCBs. Thus, it is unclear as to why this method was used since EPA's approval indicated method 3540 should be used for solid samples and wipes would be considered a "solid" rather than "liquid" sample.

Was the lab notified as to the methods that should be used for sample extraction?

Kimberly N. Tisa, PCB Coordinator

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[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)

**From:** Mike Zarba [mailto:[mzarba@newmilford.org](mailto:mzarba@newmilford.org)]

**Sent:** Friday, July 28, 2017 9:19 AM

**To:** Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)>

**Cc:** Doubleday, Edward <[EDoubleday@trcsolutions.com](mailto:EDoubleday@trcsolutions.com)>; Trombly, Gary <[Gary.Trombly@ct.gov](mailto:Gary.Trombly@ct.gov)>  
**Subject:** Re: CEC - Structural Steel Decontamination and Recycling

Kim:

Below is the response and information regarding the reason why this approach was not considered as cost effective.

Mike

The use of a high pressure wash system to remove the paint is a paint issue; not a decontamination or dust removal issue. Nevertheless, I had asked Costello for an estimate to set up a high pressure wash area and to remove all paint from the steel. The estimate was based on contractual labor and rates. Their estimated costs for this activity was >\$500k. Since the use of the low pressure wash was effective and within the scope of their contract, I believed the use of the high pressure wash was cost prohibitive and not a prudent use of the Town's resources.

Ed

Edward C Doubleday  
Senior Consultant/Project Manager

Please let me know if you need any additional information. Thank You,

*Michael F. Zarba, P.E.*

Public Works Director

Town of New Milford

[\(860\) 355-6040](tel:(860)355-6040) ext. 3247 phone

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On Thu, Jul 20, 2017 at 12:47 PM, Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)> wrote:

Mr. Zarba:

With respect to EPA's last comment pertaining to the high pressure decontamination, The Town states that this removal technique was "...determined to not be a cost effective approach". Please provide supporting documentation for this conclusion.

Kimberly N. Tisa, PCB Coordinator

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[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)

---

**From:** Tisa, Kimberly

**Sent:** Thursday, July 20, 2017 10:09 AM



**To:** 'Mike Zarba' <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)>

**Cc:** Doubleday, Edward <[EDoubleday@trcsolutions.com](mailto:EDoubleday@trcsolutions.com)>; 'Trombly, Gary' <[Gary.Trombly@ct.gov](mailto:Gary.Trombly@ct.gov)>; Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)>

**Subject:** RE: CEC - Structural Steel Decontamination and Recycling

Mr. Zarba:

I am now reviewing the May 24, 2017 Responses to EPA comments, which we received on May 30, 2017. At this point I am having difficulty with your response regarding the EMSL QA/QC info associated with the proposed approach for characterization of paint on structural steel (EPA Comment C.3.b).

The response was denoted as ATT 2: EMSL QC Data and appears to be tables with sample identifiers and % recoveries. I provide the following observations/comments:

- Without going back and looking at each and every laboratory report for the identifier, EPA cannot determine what these tables represent.
- At the top of some of the pages the title is "TUBE PCB SURROGATE RECOVERY". This makes no sense as it pertains to this project.
- On some of the data sheets the Report Limit and Conc. Refer to mg/Tube. EPA does not understand how this data relates to the project.
- On some of the sheets there is reference to Extraction Method "NIOSH 5503 Modified". EPA does not understand this extraction method for this project.
- On some of the sheet there is reference to Extraction Method 3550C, which is sonication. Method 3540 (Soxhlet) was required for solid samples under the Approval.
- There is also QA/QC information provided for Extraction Method 3510, which is a water extraction method. I am not sure what this pertains to.

Please clarify the above for the record and for my review.

Thank you.

Kimberly N. Tisa, PCB Coordinator

USEPA

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[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)

**From:** Mike Zarba [<mailto:mzarba@newmilford.org>]

**Sent:** Friday, July 07, 2017 3:56 PM

**To:** Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)>

**Subject:** Re: CEC - Structural Steel Decontamination and Recycling

Hi Kim:

Hope you are having a nice summer so far. Just checking in on the status of this review and to see if you and Gary have had a chance to discuss. As you may know we are at a standstill on this project unless/until this plan gets approved.

Thanks and please let me know if you need any additional information. Take Care,

*Michael F. Zarba, P.E.*

Public Works Director

Town of New Milford

[\(860\) 355-6040](tel:(860)355-6040)  ext. 3247 phone

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On Wed, May 24, 2017 at 3:43 PM, Mike Zarba <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)> wrote:

Attachment #4

*Michael F. Zarba, P.E.*

Public Works Director

Town of New Milford

[\(860\) 355-6040](tel:(860)355-6040)  ext. 3247 phone

[\(860\) 355-6055](tel:(860)355-6055)  fax

[www.newmilford.org/DPW](http://www.newmilford.org/DPW)

On Wed, May 24, 2017 at 3:41 PM, Mike Zarba <[mzarba@newmilford.org](mailto:mzarba@newmilford.org)> wrote:

Kim:

Please find attached the responses to your May 4, 2017 comments and the associated four (4) attachments. I will forward attachment 4 as a separate email as it is large.

I also have hard copies (in color where applicable) for both you and Gary, which I will send out via US Mail tomorrow.

Please let me know if you need anything additional or would like to discuss further.

Thank You,

*Michael F. Zarba, P.E.*

Public Works Director

Town of New Milford

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On Thu, May 4, 2017 at 11:08 AM, Tisa, Kimberly <[Tisa.Kimberly@epa.gov](mailto:Tisa.Kimberly@epa.gov)> wrote:

Mr. Zarba:

EPA has received PCB sampling data for paint samples collected from steel beams following decontamination of these beams using a low pressure water jet system. Documents provided to EPA on the structural steel beams include the following:

- **Strategic Environmental Services: September 22, 2016 PCB Sampling Plan for CEC Structural Columns and Trusses.**
- Truss and Column PCB Sampling Results. Transmitted by M. Zarba to K. Tisa via email on October 4, 2016.
- October 5, 2016. EPA (K. Tisa) notification to Town (M. Zarba) that steel beams were to be disposed as a  $\geq$  50 ppm PCB waste unless otherwise sampled to determine disposal requirements. Determination based on fact that PCBs above regulatory thresholds were identified during truss/column sampling.



- SDS identified sample locations for paint sampling. Description, map, and photo-log for samples transmitted by M. Zarba to K. Tisa via email on October 14, 2016
- ***Strategic Environmental Services, October 20, 2016 PCB Remediation Waste Pilot Study.***
- November 9, 2016. EPA (K. Tisa) comments to Town (M. Zarba) on PCB decontamination plan and that the results of the pilot study did not provide sufficient data/information to support proposed decontamination plan. Also requested that Town provide results of the SDS paint sampling results to EPA.
- November 21, 2016. Transmittal of SDS paint sampling results to EPA (K.Tisa) by SDS with Partners letter dated November 16, 2016.
- *March 2, 2017 Proposed PCB Sampling Approach for Characterization of Paint on Structural Steel.*
- *April 19, 2017 Characterization of Paint on Structural Steel and Request for Authorization to Recycle (received by EPA on 4/24/17)*
- *May 1, 2017, Attachment 3 to April 19, 2017 submittal (received by EPA on May 2, 2017)*

**Based on EPA's review of all documents listed above and its discussions with CTDEEP, EPA has identified additional comments/questions that will need to be addressed by the Town. The information presented does not clearly support the Town's position on waste classification of the structural steel at the Site.**

**EPA's comments are provided in the attachment to this email.**

**Upon review, should you have any questions, please contact us. We would request that any future discussion concerning the steel also include CTDEEP.**

*Kimberly N. Tisa, PCB Coordinator*

*USEPA*

*5 Post Office Square, Suite 100*

*Boston, MA 02109-3912*

*617.918.1527 (phone)*

*617.918.0527 (fax)*

*Tisa.Kimberly@epa.gov*



# **PCB REMEDIATION WORK PLAN**

**REVISION 7**

**CENTURY ENTERPRISE CENTER  
12 SCOVILL ROAD  
NEW MILFORD, CONNECTICUT**

Prepared by

Sebastien Brooks

Select Demolition Services, LLC  
14 Delaware Ave.  
Salem, New Hampshire

November 7, 2016 – Rev. 7

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### APPENDICES:

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APPENDIX E -	SUPER STRUCTURE DEMOLITION



**97 Rochester Neck Road**

**Gonic, NH 03839**

PCB Remediation Waste from the Milling Operation of the slab (permits inc. in Appendix D) will go to :

**Ontario County Landfill**

**1879 State Route 5 and 20**

**Stanley, Ontario County, NY 14561**

Asbestos containing roofing and building debris:

**The Dunn C&D Landfill**

**209 Partition St. Ext.**

**Rensselaer, New York 12144**

**Any liquid waste generated on the project will be drummed, labeled, and shipped to CYN Environmental Services, LLC.**

**8 Progress Drive**

**Dover, NH 03820**

Select Demolition shall ensure compliance with storage and marking requirements described in 40 CFR 761.40 and 40 CFR 761.65.

## **7.0 DECONTAMINATION PROCEDURES**

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Select Demolition employees performing the removal and disposal work will use the decontamination area contiguous to the regulated work area to remove contaminated PPE and to wash hands and any exposed skin areas prior to leaving the regulated areas.

For equipment used in this work, such as skid steers with hammering or loading attachments, the Cold Planer Select Demolition will establish a two- chamber equipment room or area that is adjacent to the Abatement zone.

## **APPENDIX D**

**Ontario County Landfill  
1879 State Route 5 and 20  
Stanley, Ontario County, NY 14561  
CERTIFICATIONS**

**New York State Department of Environmental Conservation**  
**Division of Environmental Permits, Region 8**  
6274 East Avon-Lima Road, Avon, New York 14414-9519  
**Phone:** (585) 226-5400 • **Fax:** (585) 226-2830  
**Website:** [www.dec.ny.gov](http://www.dec.ny.gov)



July 22, 2014

Ms. Karen DeMay  
Ontario County Board of Supervisors  
Ontario County Municipal Building  
20 Ontario Street  
Canandaigua, New York 14424

Re: Permit Renewal Issuance  
Ontario County Landfill  
Application ID# 8-3244-00004/00001  
Seneca (T), Ontario (C)

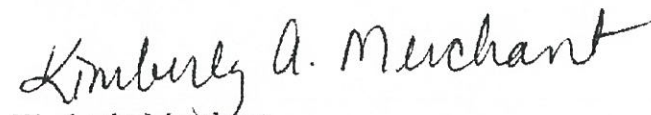
Dear Ms. DeMay:

Enclosed is your renewed Part 360 Solid Waste Management Facility Permit. The permit does not include any substantive changes from the current permit. This permit renews all existing variances and conditions.

Please note that this permit will go into effect on January 1, 21, 2015. You will be required to renew this permit prior to expiration. You must submit the paperwork at least 180 days prior to expiration.

If any questions regarding these permit conditions, please contact Edward Kieda with the Division of Materials Management at 585-226-5416.

Sincerely,

  
Kimberly Merchant  
Deputy Regional Permit Administrator

Enclosure: Renewed 360 Permit

Cc: J. E. Garvey, Ontario County Administrator  
Supervisor, Town of Seneca

Ecc: J. E. Garvey, Ontario County Administrator  
L. Schwartz, Office of General Counsel  
E. Kieda, DMM  
M. Domagala, DMM  
S. Foti, DMM  
S. Sheeley, DEP  
T. Harvey, Ontario County Planning  
T. Jensen, Ontario County Planning  
L. Shilling, Casella Renewable Systems, LLC  
A. Guida, TheWest Firm



## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

DEC PERMIT NUMBER <b>8-3244-00004/00001-0</b>
FACILITY/PROGRAM NUMBER(S)  <b>35S11</b>



# PERMIT

Under the Environmental  
Conservation Law (ECL)

EFFECTIVE DATE  01/21/2015
MODIFIED
EXPIRATION DATE(S)  01/20/2025

TYPE OF PERMIT ☐ NEW ☒ RENEWAL ☐ MODIFICATION ☒ PERMIT TO CONSTRUCT ☒ PERMIT TO OPERATE

- |   |  |   |
|---|--|---|
| <input type="checkbox"/> Article 15, Title 5:<br>Protection of Waters                     | <input type="checkbox"/> 6NYCRR 608: Water Quality<br>Certification      | <input checked="" type="checkbox"/> Article 27, Title 7;<br>6NYCRR 360: Solid Waste<br>Management |
| <input type="checkbox"/> Article 15, Title 15:<br>Water Supply                            | <input type="checkbox"/> Article 17, Titles 7, 8:<br>SPDES               | <input type="checkbox"/> Article 27, Title 9;<br>6NYCRR 373: Hazardous<br>Waste Management        |
| <input type="checkbox"/> Article 15, Title 15:<br>Water Transport                         | <input type="checkbox"/> Article 19: Air Pollution<br>Control            | <input type="checkbox"/> Article 34: Coastal<br>Erosion Management                                |
| <input type="checkbox"/> Article 15, Title 15:<br>Long Island Wells                       | <input type="checkbox"/> Article 23, Title 27:<br>Mined Land Reclamation | <input type="checkbox"/> Articles 1, 3, 17, 19, 27, 37;<br>NYCRR 380: Radiation Control           |
| <input type="checkbox"/> Article 15, Title 27:<br>Wild, Scenic and Recreational<br>Rivers | <input type="checkbox"/> Article 24: Freshwater<br>Wetlands              | <input type="checkbox"/> Other:   |
|   | <input type="checkbox"/> Article 25: Tidal Wetlands                      |   |

PERMIT ISSUED TO <b>Ontario County</b>			TELEPHONE NUMBER <b>585-396-4400</b>
ADDRESS OF PERMITTEE <b>20 Ontario Street, Canandaigua, NY 14424</b>			
CONTACT PERSON FOR PERMITTED WORK <b>John Garvey, Ontario County Administrator</b> <b>Robert Walls, Casella Waste Management</b>			TELEPHONE NUMBER <b>585-396-4400</b> <b>585-526-4420</b>
NAME AND ADDRESS OF PROJECT/FACILITY <b>Ontario County Landfill, 1879 Route 5&amp;20, Stanley, NY 14561</b>			
LOCATION OF PROJECT/FACILITY <b>South side of Route 5&amp;20 just west of the intersection of County Road 5</b>			
COUNTY <b>Ontario</b>	TOWN <b>Seneca</b>	WATERCOURSE Water Body:	NYTM COORDINATES E:330000 N:4746830
DESCRIPTION OF AUTHORIZED ACTIVITY <b>CONSTRUCTION AND OPERATION OF MIXED SOLID WASTE LANDFILL WITH AN APPROVED DESIGN CAPACITY OF 2999 TONS PER DAY. CASELLA WASTE MANAGEMENT IS THE PRESENT OPERATOR OF THE FACILITY UNDER A LONG TERM LEASE AGREEMENT WITH ONTARIO COUNTY.</b>			

By acceptance of this permit, the permittee agrees that the permit is contingent upon strict compliance with the ECL, all applicable regulations, the General Conditions specified (see page 2) and any Special Conditions included as part of this permit.

PERMIT ADMINISTRATOR: Kimberly A. Merchant	ADDRESS 6274 E. Avon-Lima Rd, Avon, NY 14414	
AUTHORIZED SIGNATURE <i>Kimberly A. Merchant</i>	DATE 7/22/2014	Page 1 of 17



**NOTIFICATION OF OTHER PERMITTEE OBLIGATIONS****Item A: Permittee Accepts Legal Responsibility and Agrees to Indemnification**

The permittee expressly agrees to indemnify and hold harmless the Department of Environmental Conservation of the State of New York, its representatives, employees, and agents ("DEC") for all claims, suits, actions, and damages, to the extent attributable to the permittee's acts or omissions in connection with the permittee's undertaking of activities in connection with, or operation and maintenance of, the facility or facilities authorized by the permit whether in compliance or not in compliance with the terms and conditions of the permit. This indemnification does not extend to any claims, suits, actions, or damages to the extent attributable to DEC's own negligent or intentional acts or omissions, or to any claims, suits, or actions naming the DEC and arising under article 78 of the New York Civil Practice Laws and Rules or any citizen suit or civil rights provision under federal or state laws.

**Item B: Permittee's Contractors to Comply with Permit**

The permittee is responsible for informing its independent contractors, employees, agents and assigns of their responsibility to comply with this permit, including all special conditions while acting as the permittee's agent with respect to the permitted activities, and such persons shall be subject to the same sanctions for violations of the Environmental Conservation Law as those prescribed for the permittee.

**Item C: Permittee Responsible for Obtaining Other Required Permits**

The permittee is responsible for obtaining any other permits, approvals, lands, easements and rights-of-way that may be required to carry out the activities that are authorized by this permit.

**Item D: No Right to Trespass or Interfere with Riparian Rights**

This permit does not convey to the permittee any right to trespass upon the lands or interfere with the riparian rights of others in order to perform the permitted work nor does it authorize the impairment of any rights, title, or interest in real or personal property held or vested in a person not a party to the permit.

**GENERAL CONDITIONS****General Condition 1: Facility Inspection by the Department**

The permitted site or facility, including relevant records, is subject to inspection at reasonable hours and intervals by an authorized representative of the Department of Environmental Conservation (the Department) to determine whether the permittee is complying with this permit and the ECL. Such representative may order the work suspended pursuant to ECL 71-0301 and SAPA 401(3).

The permittee shall provide a person to accompany the Department's representative during an inspection to the permit area when requested by the Department.

A copy of this permit, including all referenced maps, drawings and special conditions, must be available for inspection by the Department at all times at the project site or facility. Failure to produce a copy of the permit upon request by a Department representative is a violation of this permit.

**General Condition 2: Relationship of this Permit to Other Department Orders and Determinations**

Unless expressly provided for by the Department, issuance of this permit does not modify, supersede or rescind any order or determination previously issued by the Department or any of the terms, conditions or requirements contained in such order or determination.

**General Condition 3: Applications for Permit Renewals or Modifications**

The permittee must submit a separate written application to the Department for renewal, modification or transfer of this permit. Such application must include any forms or supplemental information the Department requires. Any renewal, modification or transfer granted by the Department must be in writing.

The permittee must submit a renewal application at least:

- a) 180 days before expiration of permits for State Pollutant Discharge Elimination System (SPDES), Hazardous Waste Management Facilities (HWMF), major Air Pollution Control (APC) and Solid Waste Management Facilities (SWMF); and
- b) 30 days before expiration of all other permit types.

Submission of applications for permit renewal or modification are to be submitted to:

NYSDEC Regional Permit Administrator, Region 8,  
6274 E Avon-Lima Rd, Avon, NY 14414 (585) 226-2466

**General Condition 4: Permit Modifications, Suspensions and Revocations by the Department**

The Department reserves the right to modify, suspend or revoke this permit in accordance with 6 NYCRR Part 621. The grounds for modification, suspension or revocation include:

- a) materially false or inaccurate statements in the permit application or supporting papers;
- b) failure by the permittee to comply with any terms or conditions of the permit;
- c) exceeding the scope of the project as described in the permit application;
- d) newly discovered material information or a material change in environmental conditions, relevant technology or applicable law or regulations since the issuance of the existing permit;
- e) noncompliance with previously issued permit conditions, orders of the commissioner, any provisions of the Environmental Conservation Law or regulations of the Department related to the permitted activity.

**General Condition 5:** All activities authorized by this permit must be in strict conformance with the approved plans submitted by the applicant or his agent as part of the permit application.

Such approved plans were prepared by Wehran Engineering, Fagan Engineers and Barton & Loguidice, P.C.



## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

**SPECIAL CONDITIONS**  
For Article 27, Title 7 (Ontario County Landfill)

**SPECIAL CONDITIONS**

**I. GENERAL APPLICABILITY**

1. Phase III of this facility will be constructed and utilized in multiple stages over the life of this facility. Prior to the construction of any particular stage, the permittee must submit plans and specifications to the Department. Construction of a particular stage may commence only with the expressed written approval of the Department.
2. A variance from the landfill construction provisions set forth in Section 360-2.13(d) requiring the maintenance of a minimum separation of five feet between the base of the constructed liner system and the seasonal high groundwater table is granted.
3. Unless expressly authorized in writing or unless modified by conditions of any permit issued by the Department of Environmental Conservation (the "Department"), all work will be carried out in strict conformance with the plans, specifications, and reports submitted as part of the application for this permit. Those materials include:
  - (a) Permit applications dated March 1987, November 2002, March 2005, August 2007, March 2010, November 2011;
  - (b) Engineering report December 1988, January 2003, February 2005;
  - (c) Plans;
    - Phase III Development - November 1986, Revised December 18, 1988 (Sheets 1-14)
    - Revision to Pore Water Drain - January 1990
    - Phase III Expansion, Stages IV through VII Site Plans- January 2003;
    - Phase III Modification Stages IV through VII – February 2005
    - East Borrow Area – February 2010
    - Leachate Storage Lagoons – July 1993, modified June 2011
  - (d) Operation and Maintenance Reports latest revision March 2011;
  - (e) Contingency Plans dated January 2003;

DEC PERMIT NUMBER 8-3244-00004/00001-0	FACILITY ID NUMBER 35S11
PROGRAM NUMBER	Page 3 of 17

## NEW YORK STATE DEPARTMENT OF ENVIRONMENTAL CONSERVATION

**SPECIAL CONDITIONS**For Article 27, Title 7 (Ontario County Landfill)

- (f) Environmental Monitoring Plan (EMP) dated July 2004, revised December 2010 with revisions for noise monitoring October 2007, October 2010, December 2012;
- (g) Hydrogeologic Investigation – July 1986, supplemented April 2003 and April 2004;
- (h) Quality Assurance/Quality Control Plans dated January 2003;
- (i) Closure/Post Closure Plans dated August 1992, drawing dated August 2000, revised January 2003 and February 2005;
- (j) Wetlands Mitigation and Assessment Plans – July 2005 and June 2010;
- (k) Financial Assurance Plan dated July 2004 and annual updates.

In any instance in which the above approved documents conflict with the requirements of Part 360, the more stringent shall apply.

4. The Permittee shall comply with all conditions of this permit and 6 NYCRR Part 360. Non-compliance constitutes a violation of ECL Article 27, Title 7 and is grounds for enforcement action, permit suspension, revocation, or modification, or denial of a permit renewal or modification application.
5. The Permittee must maintain a copy of all application materials, plans, reports, permits, and the Final Environmental Impact Statement at the site and make these documents available to any representative of the Department. The Permittee must also maintain a copy of all written approvals and directives in a like manner, together with a copy of the effective Part 360.
6. Unless otherwise specified by the Department, three copies of all plans, reports, or other submissions related to the design, construction, operation, or monitoring of this facility must be submitted to: Regional Materials Management Engineer, NYS Department of Environmental Conservation, 6274 East Avon-Lima Road, Avon, NY 14414.
7. Unless otherwise specified in this permit, any approval required must be obtained in writing from the Region 8 Regional Materials Management Engineer.
8. In the event a Department representative makes a determination that the Permittee is in non-compliance with any provision of the Environmental Conservation Law, or with any regulation promulgated thereunder or any provision of this permit or any judicial or administrative order applicable to the facility, the Permittee must, upon receipt of written or oral Notice of Non-Compliance from the Department, immediately take such steps as are necessary to correct, abate, or

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remediate the non-complying condition. When oral notice is given, the Department will provide a confirming written Notice of Non-Compliance. To the extent feasible, the Permittee must consult with the Department regarding the selection and implementation of such remedial measures. Any instance of non-compliance, together with the responsive measures and results of such remedial measures, must be recorded in writing by the Permittee, and submitted to the Department. Failure to do so shall constitute non-compliance with this permit.

9. The Permittee shall take all steps to minimize or correct any adverse impact on human health or the environment resulting from facility operations. The Permittee shall report any such activity which may endanger human health or the environment to the DEC Region 8 Regional Materials Management Engineer. Any such information shall be reported orally within 24 hours from the time the Permittee becomes aware of the circumstances and followed up in writing within seven days.
10. The Permittee shall allow any authorized representative of the Department upon the presentation of proper credentials, to:
  - (a) Have access to and copy any records that must be kept under the conditions of this permit or Part 360;
  - (b) Enter and inspect any buildings, facilities, equipment(including monitoring and control equipment),practices, or operations regulated or required under this permit; and
  - (c) Sample or monitor for the purpose of assuring permit compliance or as otherwise authorized by the ECL or any applicable law, regulation, permit or Order, any substances or parameters at any location.
11. The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.
12. The provisions of this permit shall not be construed to limit the Department's authority as otherwise established by law or regulation.

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13. The account to fund the Environmental Monitor(s) as established under permit #8-3244-00004/00001-0 shall continue as follows:
- (a) Funds as required to support the monitoring requirements shall be provided to the Department for funding of environmental compliance activities related to the operation of Permittee's Facility. This sum is based on annual Environmental Monitor service costs and is subject to annual revision. Subsequent annual payments shall be made for the duration of this Permit to maintain an account balance sufficient to meet the next year's anticipated expenses. The permittee shall be billed annually for each fiscal year beginning April 1, 2004.
  - (b) The Department may revise the required payment on an annual basis to include all costs of monitoring to the Department. The annual revision may take into account factors such as inflation, salary increases, changes in operating hours and procedures and the need for additional Environmental Monitors and supervision of such Environmental Monitors by full-time Environmental Monitor supervisors. Upon written request by the Permittee, the Department shall provide that entity with a written explanation of the basis for any modification. If such a revision is required, the Department will notify the Permittee of such a revision no later than 60 days in advance of any such revision.
  - (c) Prior to making its annual payment, the Permittee will receive and have an opportunity to review an annual work plan that the Department will undertake during the year.
  - (d) Payments are to be in advance of the period in which they will be expended.
14. Not less than 30 days prior to the commencement of the construction of future stages of the landfill, the Permittee must submit to the Department for its review and approval, detailed construction plans and technical specifications for that phase.

**II. CONSTRUCTION**

15. Written notice of the commencement of all major portions of on-site construction activities must be provided not less than five (5) business days in advance of the activity.

These activities include, but are not limited to, clearing and grading, placement of the liner for any large section, all on-site permeability and/or density testing activities, and construction of any section of permanent final cover.

16. Open burning of land clearing materials and debris (including trees, shrubs, and brush) is prohibited. Merchantable timber must be salvaged for commercial use. Toppings, brush, and slash must be chipped and beneficially used on or off-site.

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17. Upon commencement of construction, the Permittee must submit by the fifteenth (15th) of each month, a written progress report to the Department which summarizes construction activities undertaken during the preceding month.
18. The Department must be notified immediately in case of any development during construction that warrants a request to modify the approved engineering plans. Deviation from the approved plans without the specific prior written approval of the Department will constitute a violation of this permit. All deviations must be noted in the engineer's daily reports and monthly summaries.
19. All construction at the landfill site shall be under the supervision of a person licensed to practice professional engineering in the State of New York. This requires that a representative of your engineering consultant be present whenever construction is on-going. This representative must maintain a daily log indicating work done that day, weather conditions, testing performed, quality control, quality assurance practices, problems encountered, and remedial activities undertaken to correct these problems. A copy of this log, must be submitted with the construction certification for each cell. One copy of the certification with original signatures and stamped by the licensed engineer must indicate whether all work performed was in compliance with this permit and the approved engineering plans and reports and must be submitted within three (3) months after completion of construction. Clear color photographs of major project aspects, day reports and results of all tests conducted to determine compliance shall also be included as part of the certification. As-built engineering plans must also be certified containing at least the following:
  - (a) notation of any deviations from the approved plans and reports;
  - (b) completed sub-base elevations;
  - (c) completed liner elevations; both primary liner and secondary liner;
  - (d) location and critical elevations of leachate collection lines, leak detection lines, the top and bottom of the groundwater drainage blanket, valve pits, tanks, pond, containment berm, manholes, etc.
  - (e) final drainage features;
  - (f) locations, both existing and proposed, of all monitoring devices;

Written approval by this Department of the construction certification report is necessary before any solid waste can be placed in the newly constructed areas.

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20. Prior to and during any construction, adequate measures shall be taken to prevent siltation of surface waters both on and adjacent to the site.
21. Prior to excavation and construction of each cell, bench marks shall be located for determining elevations as filling progresses. Permanent bench marks shall be established for each stage. The location shall be noted on the "As-built" drawings. Elevations for permanent bench marks shall be taken from an existing U. S. Geological Survey benchmark. New York Transverse Mercator (NYTM) coordinates must be established for each permanent benchmark.
22. All boreholes, test pits wells and monitoring devices found within the proposed fill area shall be properly abandoned by overboring, grouting using a tremie method or similar downhole pressure grouting system and cement-bentonite grout to ensure that all contaminant migration pathways are sealed. Casings shall be removed. This activity must be noted as accomplished in the construction certification report.
23. Should any leachate enter by migration, spill or other means any stage which has not yet received refuse, all fluid within that cell shall be removed and treated as leachate. When the leachate is first detected in any stage, all stormwater drainage or pumping shall cease immediately.

**III LANDFILL OPERATION**

24. The following wastes shall not be disposed of at this facility:
  - (a) waste identified in 6 NYCRR Part 360-1.5(b);
  - (b) any empty drum or any container which has held hazardous waste and is not empty according to 40 CFR 261.7(a)(3); Containers of 5 gallons capacity or larger shall not be disposed at this facility unless the ends have been cut off and the containers have been crushed;
  - (c) any regulated medical waste which has not been treated in accordance with the requirements of 6NYCRR Subpart 360-17 or 10NYCRR Subpart 70-3;
  - (d) waste tires unless the tires have been shredded or, as a minimum, cut in half around the circumference;
  - (e) leaves, grass clippings, stumps, brush, trees, and other yard waste;
  - (f) any industrial or commercial liquids, sludges, or slurries, which are less than 20 percent solids and/or contain free liquids;

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- (g) any waste(s) regulated by 6 NYCRR Part 364 unless the waste hauler possesses a valid Part 364 permit which specifies this landfill as a disposal site for such waste(s), disposal of such waste has been approved by the Permittee in writing and a copy of the written approval has been forwarded to the Region 8 Regional Solid Waste Engineer within seven (7) calendar days of such approval.
25. The approved design capacity for this landfill is 2999 tons/day. This threshold is a daily average and is based on the quantity of solid wastes accepted at the landfill during a calendar year, however during no calendar quarter shall the daily average exceed 4499 tons per day. Solid wastes that have been approved for use as alternate daily cover or other approved beneficial uses are not included in this limit as long as they are actually being used as approved. By no later than the **15th** day of each month, the permittee shall report in writing to the Region 8 Regional Materials Management Engineer, the total amount of solid waste disposed at the facility during the previous month, the number of days of operation, and the amount of BUD cover wastes received, and copies of all special waste profiles approved in the previous 30 days.
26. Operation, including the placement of daily cover, at this facility shall be limited to the following:
- Monday thru Friday                      6:00 a.m. to 6:30 p.m.  
 Saturday                                      6:00 a.m. to 3:00 p.m.  
 Saturday following holiday\* 6:00 a.m. to 6:30 p.m.  
 \*Holiday shall include New Year's Day, Memorial Day, July 4<sup>th</sup>, Labor Day, Thanksgiving and Christmas.
- Construction and operation activities are prohibited on the following Federal/State holidays: New Year's Day, Memorial Day, July 4<sup>th</sup>, Labor Day, Thanksgiving and Christmas.
27. During the placement of the first lift of waste above the primary leachate collection and removal system, the following precautions and practices will be observed:
- (a) consideration for the approach and travel of haul trucks and other landfill operation vehicles relative to the location of the liner and leachate collection laterals.
  - (b) waste placement must be kept away from the top of the berms to allow for proper leachate control and effective future placement of final cover. Identification markers may be used along the berms with specific setback distances for waste placement.
  - (c) Placement of a select type refuse being free of demolition debris, large metal wastes, long items such as poles, piping and bulky wastes in general, and shall be placed in a minimum lift thickness of at least five (5) feet above the leachate collection and removal system.

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- (d) Prior to placing any solid waste in an area when the waste could come into contact with the side slope, the permittee shall ensure that 24 inches of drainage blanket is in place, in accordance with the approved plans. The protective layer over the synthetic liner will be placed and maintained at least 10 feet in advance of waste placement.
28. Radio communication between the landfill office and the working face shall be provided at all times during operating hours.
29. All structures, including the leachate collection and removal system, groundwater and gas monitoring wells, access roads, drainage structures, etc., shall be maintained in proper working order. In the event any structure becomes damaged or malfunctions in any way, the Permittee shall notify the Department verbally within 24 hours and follow up in writing within seven (7) days, and shall promptly replace or repair the structure. All monitoring wells (groundwater and gas) shall be fitted with locking caps and locked at all times other than during times of sampling.
30. All wastes received at the disposal site must be spread and compacted in layers not more than two (2) feet thick upon deposition at the working face, excepting the first lift placed on the liner system.
31. The Permittee shall require that all vehicles delivering waste or cover material to the site be enclosed or covered or their contents secured.
32. On-site roads used to transport solid wastes shall be maintained passable and safe at all times. No penetrating or waste oils shall be used for dust control.
33. Wind-blown paper and other litter shall be confined to the disposal area by snow fence, portable screens, natural screening, or any other necessary devices. The Permittee shall police wind-blown paper and litter along the landfill's perimeter as necessary and at least once a week.
34. The entire site shall be routinely inspected for rodent activity. The rodent control programs described in the Contingency Plan shall be implemented to effectively control vectors at the landfill.
35. Silt shall be removed from the siltation ponds on an as needed basis during the driest season of the year. At all times, a minimum sediment storage shall be capable of accommodating a 25 year storm. Silt shall not be removed between October 15 and May 15.
36. Daily, intermediate, and final cover must be applied as required by Part 360.

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37. Cover soil and drainage control structures must be designed, graded and maintained to prevent ponding and erosion and to minimize infiltration of water into the solid waste cells.
38. All sludges and chemical, industrial, commercial, food, or power plant wastes must be reviewed by the permittee before accepting these wastes for disposal at this facility. All records relating to the disposal of these wastes at this facility shall be made available to the Department during inspections. Copies of all waste stream applications or requests for disposal of wastes must be stored at the landfill site and must be made available for inspection by Department staff.

**IV LEACHATE CONTROL**

39. Any leachate on the ground shall immediately be contained and removed either by pumping or by utilizing spill cleanup procedures such as absorbent pads. Leachate and leachate spill debris must be disposed of at authorized facilities approved by the Department.
40. A weekly visual inspection shall be conducted by the operator on the non-perforated main leachate collection lines, force mains and manholes. If leachate is being carried in the outer pipe or if there is evidence of plugging, DEC must be notified verbally within 24 hours, followed up in writing within (seven) 7 days and corrective measures implemented promptly. The dates and results of all inspections shall be included in the Annual Report.
41. The Permittee shall maintain a contingency plan which shall identify the alternative leachate treatment and disposal methods that will be employed in the case of: malfunction of the existing leachate treatment/disposal system; inadequate system capacity to manage short-term increased leachate volumes; and/or the leachate is not acceptable to the existing wastewater treatment plant. Should any element of the contingency plan become unavailable, or inoperative, a revised plan shall be submitted, subject to Department approval within 60 days.
42. The Permittee shall inspect the primary and secondary leachate collection (leak detection) and removal system bi-weekly and pump stations weekly. Should the defined action leakage rate levels (20 gallons per acre per day) be exceeded, or groundwater monitoring wells indicate significant increases in contaminant levels above established background, the Permittee will notify the Department verbally within 24 hours and follow-up within seven (7) days in writing and immediately initiate the appropriate actions as defined in the contingency plan. A standard report form shall be initiated by the landfill operator indicating the time, date and result of these field inspections (including the results of any tests which might be performed to determine the nature of detected fluids (i.e., specific conductivity, pH, and temperature) and submit them to the Department as part of the Annual Report.
43. The primary leachate collection and removal system shall be flushed at least annually to maintain an unobstructed and free draining collection system. Should the leachate collection

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and removal system's efficiency be found to be impaired, then remedial cleaning operations shall be conducted with written notification of such activity given to the Department prior to the commencement of cleaning. The annual flushing shall be accomplished using a high pressure hose through the entire length of each collection pipe and header pipe of the primary leachate collection system.

44. Under no circumstances shall leachate be discharged directly or indirectly from the site to surface waters or groundwaters. Leachate recirculation may be conducted provided that the construction and operation is in conformance with plans and specifications that have been approved by the Region 8 Regional Materials Management Engineer.
45. Adequate leachate storage must be available to meet the leachate collection needs of the facility throughout the operational and post-closure maintenance periods. A log of all visual inspections of facility structures must be maintained at the site. At a minimum, the log must detail the date, time, inspector, visual observations, problems, and any corrective actions taken.
46. Leachate removed from the facility shall be by a hauler in possession of a valid Part 364 permit, authorizing such hauler to haul leachate from the facility to a specified disposal site approved by the Department.
47. If refuse is deposited within a cell located on top of an area which has received intermediate cover, a portion of the intermediate soil cover shall be removed from the area to be filled so as to adequately allow leachate to reach the leachate collection system.
48. A log of the visual inspections of the leachate collection system must be maintained at the site. At a minimum, the log must detail: date, time, inspector, visual observations, problems, and any corrective actions taken. If any part of the leachate collection system becomes damaged or malfunctions, the Permittee must notify the Department verbally within 24 hours, and follow up in writing within seven (7) days, and must promptly repair or replace the damaged structure, or undertake other remedial action as authorized by the Department.

V. ANNUAL REPORTING

49. Annual reporting will include, but not be limited to, the items listed in this condition and shall be submitted to the Department no later than March 1 of each year. This report must detail:
  - (a) The total quantity of solid waste disposed of, in tons, for the calendar year from January 1st to December 31. This information must be compiled by waste type such as refuse, sludge, construction and demolition, non-hazardous commercial waste, or other types of solid waste by County (and State, if origin is out of New York State) of origin. All wastes received at the facility shall be measured by weight. These

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measurements shall be recorded on a daily basis. These records shall be maintained for the life of the facility.

- (b) The remaining site life in years and remaining capacity in cubic yards of the existing constructed landfill.
- (c) An evaluation of all water and leachate quality data collected throughout the year. The Department may request at any time that this information be provided in a computer-compatible format to be specified by the Department.
- (d) An evaluation of gas monitoring and control systems, including a narrative description of proposed or actual changes to these systems.
- (e) The quantity of leachate collected, treated and disposed of on a monthly basis.
- (f) The quantity of leachate collected in the secondary leachate collection/leak detection and removal system. This must be compiled on a monthly basis to assess primary liner system performance. These figures should compare to the action leakage rates.
- (g) A revised site plan with 5-foot contours of the fill area reflecting the extent of the previous year's fill progression and the proposed fill progression for the next year.
- (h) Any proposed changes from the approved reports, plans, and specifications or permit conditions must be listed with justification for each change given. No change shall be effective until written approval is received from the Department.
- (i) An annual summary of each type of recycled material collected from each municipality.
- (j) An updated Financial Assurance Report.

**VI. RECYCLING**

50. Annual reports shall be submitted to the Department by March 1 of each year for the previous calendar year. This report must include the following information:

- (a) the activities the County has completed or that were in progress for the period of time covered by the report and what measures were taken to improve the program's recycling recovery rate (i.e., the participation rate, each participant's separation efficiency, the percent of the waste stream that is recyclable and the system's efficiency);

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- (b) the total solid waste percentages, and the actual percentages and tonnages of recyclables removed from the waste stream for each type of recyclable. This break down shall be tabulated for each municipality. These totals shall be compared to the projected recovery rates contained within the Department approved Comprehensive Recycling Analysis and any Department approved revisions or updates and the results of that comparison discussed.

If the originally projected recovery rates have not been met, an explanation shall be provided with a plan to address currently feasible strategies to achieve the projected recovery rates; and an analysis of what markets then exist for specific components of the nonhazardous solid waste stream generated within the service area which are not currently being recycled; and the Permittee must conduct a review of developing technologies that may result in the creation or enhancement of economic markets for those components of the waste stream not required to be separated at the time of analysis. This section shall indicate the specific materials which will be added to the list of components which must be source separated as part of the County's recyclables recovery program and provide detailed market justifications for those materials not added to the list of materials to be source separated.

51. The Permittee shall ensure that the recyclable recovery program is implemented in accordance with the time frames indicated in the Department approved Ontario County Comprehensive Recycling Analysis and any Department approved revisions or updates to this document. Any significant revisions made to the program and/or the schedule shall be submitted to the Department for review and approval. If the Department does not issue a written response within thirty (30) days, such changes shall be deemed to be approved.
52. The County must not discontinue the source separation and collection of any or all of the recyclables collected as part of the recyclables recovery program unless, as to the particular recyclable in question, the County determines that there is no economic market (as that term is defined in General Municipal Law 120-aa) for the material.

The Permittee may only determine that an economic market does not exist for any waste stream by:

- (a) preparing a report substantiating that no economic market exists for recycling such component; and
- (b) contacting the Department of Economic Development, Office of Recycling Market Development, 111 East Avenue, Suite 220, Rochester, New York 14604; telephone number: (585)-325-1944, to seek their assistance in locating an economic market for the subject component and providing documentation of their efforts and final results;

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- (c) issuing a determination of lack of existence of an economic market for such component, and publishing notice of such determination and the report's availability in a newspaper having general circulation within the County; and
- (d) submitting three copies of the report and determination to the Department for review and receiving Department approval.

The Permittee's determination of lack of an economic market will remain in effect until the Permittee determines that an economic market for such component exists or for six (6) months, whichever is less.

**VII. CLOSURE/POST-CLOSURE**

- 53. The Permittee shall notify the Department whenever changes in operating plans, waste deposition rates, facility design, or events occurring during the active life of the landfill change the projected final closure date by more than twelve (12) months. The notice shall be submitted in writing to the Department within sixty (60) days of such changes in Permittee's plans, deposition rates, design, or events at the landfill. All proposed amendments shall be subject to the Department's approval and shall not be effective unless said approval is received in writing.
- 54. Twelve months before the date at which the landfill will cease accepting waste, the Permittee shall submit a Scope of Work which shall include: 1) a site investigation plan and 2) a schedule of all tasks required to implement a closure in conformance with the regulations expected to be effective at the time of closure. The schedule shall be in agreement with the final closure date set forth in the permit. The facility shall be maintained for a period of no less than thirty years beyond the placement of final cover.
- 55. A permanent grass or ground cover crop must be established and maintained on all exposed final cover soil within sixty (60) days after placement.
- 56. Final cover integrity, slopes, cover vegetation, drainage structures, leachate collection and removal structures established pursuant to this permit shall be maintained for a minimum period of thirty (30) years beyond the date of the placement of final cover, or for as long as leachate is produced at this facility, whichever is longer.

**VIII. FUTURE SUBMISSIONS**

- 57. Groundwater, surface water, and leachate sampling methodologies and analyses of samples must be performed in accordance with the Analytical Services Protocol developed by New York State Department of Environmental Conservation dated September 1989 or as otherwise acceptable to the Department.

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**IX. ENVIRONMENTAL MONITORING**

58. The groundwater suppression system shall be monitored annually in accordance with the approved Environmental Monitoring Plan through the operational, closure, and post-closure periods of this facility, or for as long as leachate is produced, whichever is longer. If leachate is detected in any zone of the leak detection system, then sampling frequency of the groundwater suppression system shall be increased to quarterly.
59. To allow the Department an opportunity to split samples, notification no later than 30 days in advance planned of sampling events shall be submitted to the Region 8 Regional Materials Management Engineer, for each quarter of the operational, closure, and post-closure maintenance periods of this facility.
60. A leachate monitoring program shall be established in accordance with 6 NYCRR Part 360-2.11(c)(3) and the approved Environmental Monitoring Plan.
61. The frequency of analysis, location of sampling points, and parameters to be analyzed for shall be in accordance with the Environmental Monitoring Plan.
62. This approval does not relieve the applicant of the responsibility of complying with any applicable Federal, State, or local ordinances, regulations, or laws.
63. A noise monitoring program as described by an amendment to the Department approved Environmental Monitoring Plan shall be implemented at the landfill site to demonstrate compliance with 6 NYCRR Part 360-1.14(p). All noise monitoring shall be in conformance with the Department-approved amendment. The Department-approved noise monitoring amendment shall be updated as operations change at the site. The updates shall be approved by the Department prior to changes in operations taking place.
64. A Wetlands Monitoring Plan as described in Appendix C of the Report that was submitted June 24, 2010 by Barton and Loguidice, P.C. shall be implemented prior to any soil excavation from the borrow area. Annual reports shall be prepared in accordance with Section 5.0 and are due March 1 of each year that the borrow area is active. Annual reports (3 copies) shall be submitted to the Region 8 Regional Materials Management Engineer and shall be reviewed by the Bureau of Habitat as part of the Department's on-going evaluation of the borrow area's potential to impact wetland's hydrologic regime in order to ensure that there continue to be no alterations to the wetland that are regulated under ECL Article 24 and 6 NYCRR Part 663.

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**X. EQUIPMENT NOISE VARIANCE**

65. A variance from 6NYCRR Part 360-1.14(p)(4) with regard to the maximum sound level of 80 dB(A) at a distance of 50 feet from operating equipment is granted. Maximum sound level off site must comply with 6NYCRR Part 360-1.14(p).
66. The Environmental Monitoring Plan is hereby modified to include quarterly noise monitoring at monitoring points NM-1, NM-2, and NM-3 using the methodology described in the Environmental Monitoring Plan.
67. No later than 30 days after the effective date of permit modification, the permittee shall submit to the Department one copy of each proof of recording page for the noise easements for the properties located south of Phase III on the west side of County Road 5. Each proof of recording page shall include, as a minimum, the name of the owner of the affected property, date that the easement was filed with the Ontario County Clerk, and the Liber and Page. The copies of the recording pages shall be submitted to the Region 8 Regional Materials Management Engineer. In the event that any of these noise easements are terminated for any reason, the permittee shall notify the Region 8 Regional Materials Management Engineer within seven (7) business days.

END OF PERMIT CONDITIONS

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**Ontario County Landfill**

Not Valid Unless Signed By: Jerry Leone

Signature: [Handwritten Signature]

Date: 9/14/16

**General Information**

Facility Name: Ontario County Landfill  
Physical Address: 1879 State Route 5 and 20  
City, County, State, Zip: Stanley, Ontario County, NY 14561  
General Manager: Matt East  
Telephone Number: (518) 528-9874  
Environmental Manager: Jerry Leone  
Telephone: (607) 435-9996

**1. Ownership**

Name of Legal Facility Owner: Ontario County  
Address, City, State, Zip: 20 Ontario Street, Canandaigua, NY 14424  
Name of Legal Property Owner: Ontario County  
Address, City, State, Zip: 20 Ontario Street, Canandaigua, NY 14424  
Leased expiration date (YYYY): Year 2028

**2. Site Background**

Prior use of site (past 20 yrs.): Site was used as a landfill since the 1970's.  
Years in Operation: Approximately 12.5 years operated by Casella.  
Prior Operator: Ontario County



## 2. Site Background Continued

<b>Brief description of site history:</b>	Site was used for farming/agriculture prior to use as a landfill. The site office was the former Post Manor Family Estate.
<b>General surrounding land use:</b>	The facility is surrounded by rural property in all directions. Some residential houses are located in the vicinity of the landfill, but the majority of the property is actively farmed.
<b>General hydrogeologic setting:</b>	The surficial geology of the site can be broken down into two distinct units; the upper most unit is generally described as a brown, loose ablation till composed of medium to fine sand, some silt and gravel with cobbles and boulders, the underlying unit is generally described as a gray, very dense, lodgment till composed of silty and very fine sand with trace clay and some to trace coarse to fine gravel. Refer to Groundwater section for additional information.
<b>Groundwater modeling:</b>	Hydrogeological modeling has been conducted and submitted to NYSDEC as part of the solid waste permitting process for the facility.
<b>Is any part of the facility located w/in 100 yr flood plain? If so, describe.</b>	No.
<b>Water bodies located on or near to property:</b>	Unnamed tributary of Flint Creek
<b>Nearest public drinking water supply:</b>	Seneca Lake, approximately 5.5 miles East

## 3. Facility Information

<b>Total Acreage of Facility:</b>	389 acres
<b>Acreage in Active Use:</b>	Current lined area in Phase III is 84.6 acres
<b>Life Expectancy:</b>	Current permitted capacity until 2028.
<b>Total Capacity (cy):</b>	14.8M CY current permitted capacity
<b>Number of On-Site Employees:</b>	Approximately 27
<b>Nature of Site Security:</b>	Fencing at access points, gates, vehicular access controlled by scale house
<b>Daily Tonnage Limitation:</b>	2,999 tons per day
<b>Annual Tonnage Limitation:</b>	Approximately 930,000 tons per year
<b>Tons Disposed for Prior Year</b>	907,091 tons in 2015
<b>Days/Hours of Operation:</b>	Gate Hours M-F 7:00 am - 4:30 pm, Sat. 7:00 am – 11:00 am



### 3. Facility Information Continued

<b>Acceptable Wastes:</b>	Non-hazardous MSW, C&D debris, residential institutional, industrial and commercial waste, and previously approved industrial and special wastes.
<b>Prohibited Wastes:</b>	Regulated hazardous waste, regulated medical waste, pesticides and chemicals, explosives, vehicle batteries, source separated recyclables, hot ashes, scrap metal, septic tank waste, radioactive waste, liquid waste, whole tires, green (yard) waste, waste oils and CFC containing appliances.

### 4. Waste Acceptance Procedures

<b>Procedures for Waste Acceptance:</b>	All vehicles are weighed upon arrival and departure. All loads must be in a fully enclosed vehicle or covered with a tarp or net covering the entire load. The scale attendant verifies the municipality of generation and type of waste. If required, Part 364 permit is verified. If the load is industrial waste, the scale attendant reviews the manifest and confirms waste approval. The landfill office needs to be notified of the intended delivery of asbestos-containing material 24 hours prior to disposal.
	Special wastes and industrial wastes are pre-characterized and technically reviewed and approved by the Casella Special Waste Department. Beneficial Use Determinations must receive NYSDEC approval prior to delivery.
<b>Procedures for Prevention of Unacceptable Waste:</b>	Measures to prevent the delivery of unacceptable waste include: customer communication, training of facility operations staff, posted signage, and visual inspections of incoming waste loads.  After the waste has been discharged and is being spread at the working face, operators generally look for unacceptable materials. On a weekly basis, at least one vehicle is randomly chosen for a more thorough inspection.

### 5. Facility Infrastructure & Environmental Controls

<b>Liner System:</b>	NYS Part 360 standard double-composite liner system, which is more stringent than a Federal Subtitle D standard liner design.
<b>Cover Procedure:</b>	At the conclusion of each working day, the workface is covered with six inches of soil or an approved alternate daily cover. After 30 days of inactive use in an operating area, 12 inches of intermediate cover or an approved alternate, is applied. Final cover is designed in compliance with NYS Part 360 regulations and the operating permit.
<b>Leachate Collection &amp; Treatment System:</b>	Leachate is collected from both the primary and secondary collection systems and managed in an on-site double lined lagoon. Leachate is sampled and analyzed on a monthly basis. Leachate is trucked and disposed of primarily at the Geneva WWTP and the Canandaigua WWTP. Back-up disposal agreements with Webster WWTP, Steuben WWTP and Auburn WWTP are also in place.
<b>Air Emissions &amp; Pollution Control Equipment:</b>	Active gas collection system and flares, and landfill gas-to-energy (LFGTE) facilities owned and operated by a third party.

## 5. Facility Infrastructure & Environmental Controls Continued

### Landfill Gas Collection and Treatment System:

The landfill uses an active gas collection system of vertical and horizontal piping and gas wells to direct gas to an on-site LFGTE facility owned and operated by a third party. As a backup to the gas-to-energy facility, the site also uses flares to manage gas destruction and odor control and one low NOx unit.

### Groundwater Monitoring System & Protocol:

Both upgradient and downgradient groundwater monitoring wells are sampled quarterly as required by the facility's Part 360 Solid Waste Permit, listed below. Results are submitted to NYSDEC and reviewed by an NYSDEC hydrogeologist.

### Stormwater Runoff Control:

The daily landfill working face is graded so that all rainwater coming in contact with the waste is directed to the leachate collection system. All outside slopes are covered with a minimum of 12 inches of intermediate cover to mitigate stormwater infiltration. The site has a stormwater management control system of swales and sedimentation ponds; consistent with the site Stormwater Management Plan approved by NYSDEC. Per the SPDES permit, stormwater outfalls are visually inspected on a quarterly basis and samples are collected and analyzed for specific parameters on an annual basis.

### Surface Impoundments:

Several on-site sedimentation ponds are used to manage stormwater. The site stores leachate in a double-lined surface impoundment, constructed identical to the landfill liner system over natural soil.

### Spill Control:

The site has a Spill Prevention, Control and Countermeasures (SPCC) Plan for managing petroleum products to prevent spills to the greatest extent practical, including secondary containment for petroleum tanks, spill kits and annual staff training.

### Total Aggregate Volume of All Tanks:

The aggregate aboveground oil storage capacity is 20,272 gallons, excluding containers with storage capacities less than 55 gallons and the two temporary 1,000 gallon diesel fuel storage tanks used for construction. Specific tank volumes are listed in the SPCC Plan maintained at the site.

### Method of Tank Overfill Protection:

Visual/audible overfill alarms.

### Method of Secondary Containment:

All tanks are double walled, have bermed or concrete secondary containment or containment pallets.

## 6. Regulatory Inspections

Listed below are the regulatory agencies that inspect this facility.

Agency Name	Contact	Telephone	Frequency	Last Inspection (MM-DD-YYYY)
NYSDEC Region 8 - Solid Waste	Gary Maslanka	(585) 226-5414	Weekly	On File at the Site
NYSDEC Region 8 - Solid Waste	Dave Kay, Joe Melito, Jason Bolivar, Mike Miles	(585) 226-5412	3-4 times/week	On-File at the Site
NYSDEC – Air Pollution Control	Michele Kharroubi	(585) 226-5312	Annually	On-File at the Site



## 7. Permit Information

Permit Description	Issuing Agency	Permit Number	Effective Date (MM-DD-YYYY)	Expiry Date (MM-DD-YYYY)
NYSDEC Part 360 Permit for MSW Landfill Operation	NYSDEC Solid Waste	8-3244-00004/00001	1/21/2015	1/20/2025
NYSDEC SPDES Permit for Stormwater Discharge	NYSDEC Water Quality	NYR00C382	9/30/2012	9/30/2017
NYSDEC Air Quality - Title V Air Permit	NYSDEC Air Quality	8-3244-00004/00007	1/26/2016	12/1/2019
Leachate Discharge	Geneva WPCP	4038	3/21/2014	3/21/2025
	Steuben WWTP	Letter	3/4/2014	No Expiration
	Canandaigua WWTP	4044	3/13/2016	3/13/2018
	Auburn WWTP	#2014-02	12/16/2014	12/16/2017

Copies of above listed permits will be provided upon request only.

## 8. Permit Plan Documentation

Plan	Required	Description	Latest Revision
Facility Operations & Maintenance Manual	Reviewed and Approved by NYSDEC – Required by Part 360 Permit	Operations, maintenance, waste acceptance, screening procedures, emergency response, security, training and record keeping.	May-16
Spill Prevention, Countermeasure, and Control Plan	US EPA 40 CFR Part 112; aggregate petroleum storage > 1,320 gallons	Plan identifies the total number, size and locations of petroleum tank storage and a plan for prevention and countermeasures.	Apr-16
Stormwater Pollution Prevention Plan (SWPPP)	NY State Pollutant Discharge Elimination System (SPDES) Stormwater Permit	Plan identifies the stormwater controls and the outfall locations for the site and the stormwater sampling protocol required by NOI for the operation.	May-16
Environmental Monitoring Plan	In accordance with rules and regulations of 6 NYCRR part 360	Describes on-site and off-site monitoring programs for all environmental and facility-monitoring points.	Jan-15

Due to the storage of listed materials, the site is subject to EPCRA Tier 2 Reporting under SARA Title III.

## 9. Closure Plan

<b>Closure Cost Estimate (\$):</b>	\$ 13,038,910 as of 2015 Annual Report
<b>Post Closure Cost Estimate (\$):</b>	\$ 10,257,315 as of 2015 Annual Report
<b>Frequency of Adjustment</b>	Closure Cost Estimate is updated annually and submitted to NYSDEC with the Annual Report
<b>Date last closure cost estimate was reviewed and approved:</b>	Submitted to NYSDEC with the Annual Report - March 2016
<b>Funding Mechanism:</b>	Surety Bond
<b>Bonding Company:</b>	Evergreen National Indemnity Company

## 10. Insurance

<b>General Liability Carrier and Limit:</b>	Lexington Insurance Co. \$3,000,000 each occurrence & \$4,000,000 general aggregate.
<b>Environmental Liability Carrier and Limit:</b>	Zurich Insurance Co. \$13,000,000 per occurrence & general aggregate
<b>Auto Liability Carrier and Limit:</b>	Old Republic Insurance Co. \$3,000,000 combined single limit with \$1,200,000 maximum deductible.
<b>Worker's Compensation Liability Carrier and Limit:</b>	Old Republic Insurance Co. \$3,000,000 each accident with statutory limits and \$1,000,000 deductible.
<b>Umbrella Carriers and Limit (GL, Auto, Worker's Comp excess):</b>	Total coverage \$50,000,000 with \$3,000,000 deductible. XL Insurance primary \$25,000,000 with \$3,000,000 deductible. Ohio Casualty secondary \$25,000,000.

## 11. Releases and Any Off-Site Contamination

**Nature, quantity, and date of any agency reportable spill or release of pollutants within the past three years that have occurred at this facility (i.e. fires, spills, etc.):**

Minor spills have occurred at the facility as a result of hauler's equipment malfunction. Spills were contained and remediated, all clean-up efforts were completed to NYSDEC satisfaction.

In August 2016, a leachate spill of approximately 250 gallons occurred from an on-site leachate pipe during cell construction activities. The spill occurred in a 4 foot deep trench. The leachate was quickly removed from the trench with a vacuum truck and disposed in the on-site leachate storage system. The impacted soil was also quickly excavated and disposed of at the working face. The adjacent stream and wetland have been monitored to ensure that no leachate has entered. An NYSDEC representative was on-site at the time of the spill, and the spill has been remediated to their satisfaction.

**Existing on-site or off-site contamination of air, soil, surface water, or groundwater, etc. related to the facility's activities.**

None known.



## **12. Health, Safety, and Emergency Protocols**

**Fatalities at this facility in the last three years:** None

**Most recent OSHA inspection and findings:** OSHA inspected the site on May 10th, 2016. No violations were found.

**Emergency equipment:** Telephone, cell phones for managers, two-way radio system in all vehicles as well as the scale, spill response equipment, first aid kits, fire extinguishers and other heavy equipment, and a water truck for dust and fire suppression. Audible systems such as horn signals to communicate with the trucks as to where to stop for positioning.

## **13. Community Relations**

**Public complaints against the facility in the past three years.**

Records relating to odor complaints are maintained at the site. This information is available for review upon request.

**Issue resolved with the community.**

See above comment.

## **14. Compliance History**

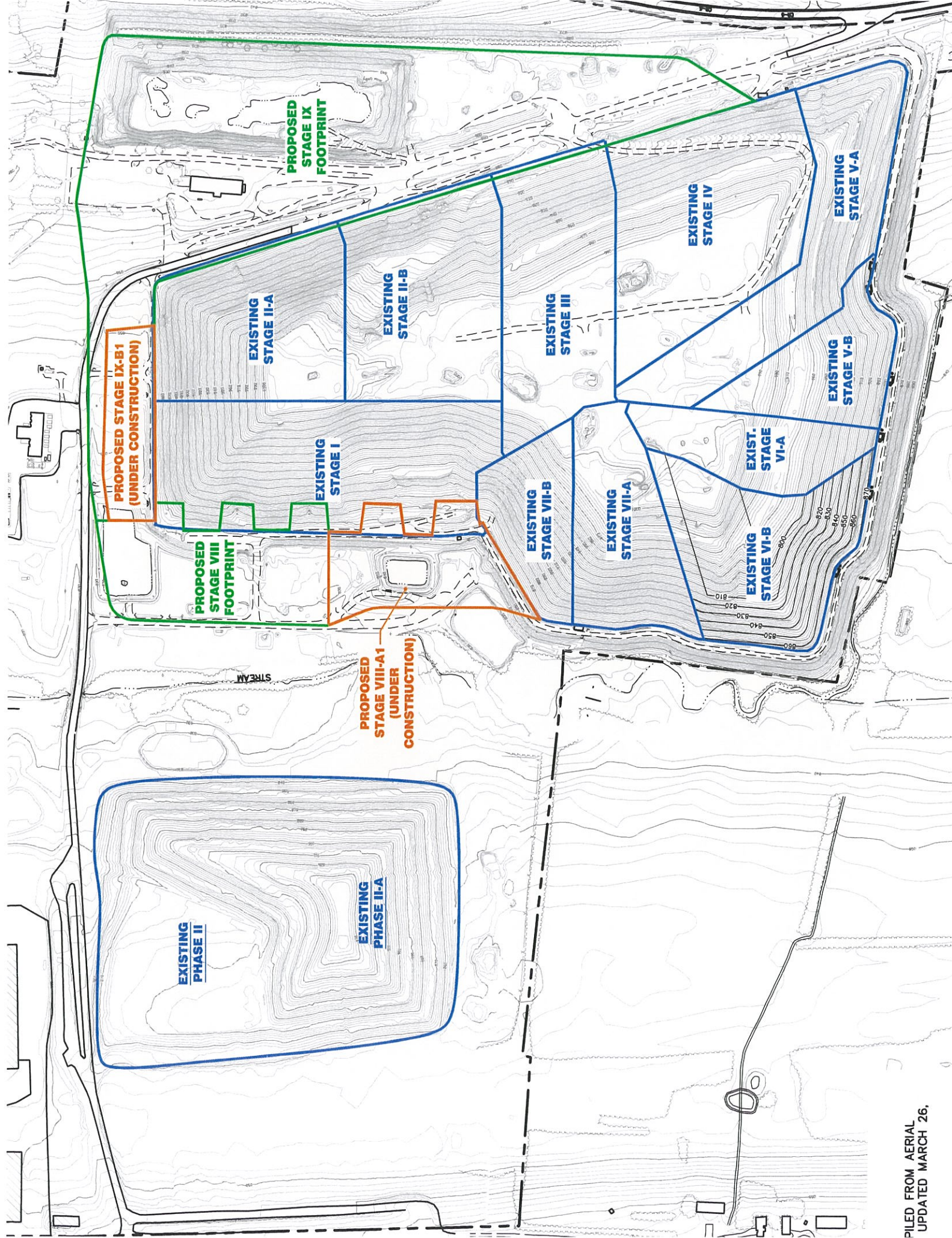
**Environmental-related enforcement actions issued by any local, state, or federal agency in the past 3 years.**

The site has received no environmental enforcement actions in the past 3 years.

## **15. Financial Information**

Casella is a publically traded company and our SEC filing documentation is available on our website (<http://ir.casella.com/>).









# CERTIFICATE OF LIABILITY INSURANCE

DATE (MM/DD/YYYY)

9/29/2016

THIS CERTIFICATE IS ISSUED AS A MATTER OF INFORMATION ONLY AND CONFERS NO RIGHTS UPON THE CERTIFICATE HOLDER. THIS CERTIFICATE DOES NOT AFFIRMATIVELY OR NEGATIVELY AMEND, EXTEND OR ALTER THE COVERAGE AFFORDED BY THE POLICIES BELOW. THIS CERTIFICATE OF INSURANCE DOES NOT CONSTITUTE A CONTRACT BETWEEN THE ISSUING INSURER(S), AUTHORIZED REPRESENTATIVE OR PRODUCER, AND THE CERTIFICATE HOLDER.

**IMPORTANT:** If the certificate holder is an ADDITIONAL INSURED, the policy(ies) must be endorsed. If SUBROGATION IS WAIVED, subject to the terms and conditions of the policy, certain policies may require an endorsement. A statement on this certificate does not confer rights to the certificate holder in lieu of such endorsement(s).

<b>PRODUCER</b> Noyle W. Johnson, Inc. 119 River Street P.O. Box 279 Montpelier VT 05601-0279	<b>CONTACT NAME:</b> Amanda Mercier <b>PHONE (A/C, No, Ext):</b> (802) 223-8072 <b>FAX (A/C, No):</b> (802) 223-7515 <b>E-MAIL ADDRESS:</b> amercier@nwjinsurance.com <b>PRODUCER CUSTOMER ID #:</b> 00004029														
<b>INSURED</b> Casella Waste Services of Ontario, LLC.  3555 Post Farm Road  Stanley NY 14561	<table border="1"><thead><tr><th>INSURER(S) AFFORDING COVERAGE</th><th>NAIC #</th></tr></thead><tbody><tr><td>INSURER A :Lexington Insurance Co.</td><td>19437</td></tr><tr><td>INSURER B :Old Republic Insurance Co.</td><td>24147</td></tr><tr><td>INSURER C :Steadfast Insurance Co.</td><td>26387</td></tr><tr><td>INSURER D :</td><td></td></tr><tr><td>INSURER E :</td><td></td></tr><tr><td>INSURER F :</td><td></td></tr></tbody></table>	INSURER(S) AFFORDING COVERAGE	NAIC #	INSURER A :Lexington Insurance Co.	19437	INSURER B :Old Republic Insurance Co.	24147	INSURER C :Steadfast Insurance Co.	26387	INSURER D :		INSURER E :		INSURER F :	
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INSURER E :															
INSURER F :															

**COVERAGES****CERTIFICATE NUMBER:** Ontario County LF 2016#3**REVISION NUMBER:**

THIS IS TO CERTIFY THAT THE POLICIES OF INSURANCE LISTED BELOW HAVE BEEN ISSUED TO THE INSURED NAMED ABOVE FOR THE POLICY PERIOD INDICATED. NOTWITHSTANDING ANY REQUIREMENT, TERM OR CONDITION OF ANY CONTRACT OR OTHER DOCUMENT WITH RESPECT TO WHICH THIS CERTIFICATE MAY BE ISSUED OR MAY PERTAIN, THE INSURANCE AFFORDED BY THE POLICIES DESCRIBED HEREIN IS SUBJECT TO ALL THE TERMS, EXCLUSIONS AND CONDITIONS OF SUCH POLICIES. LIMITS SHOWN MAY HAVE BEEN REDUCED BY PAID CLAIMS.

INSR LTR	TYPE OF INSURANCE	ADDL INSR	SUBR WVD	POLICY NUMBER	POLICY EFF (MM/DD/YYYY)	POLICY EXP (MM/DD/YYYY)	LIMITS
A	<b>GENERAL LIABILITY</b>						
	<input checked="" type="checkbox"/> COMMERCIAL GENERAL LIABILITY						
	<input type="checkbox"/> CLAIMS-MADE <input checked="" type="checkbox"/> OCCUR			082695204	4/30/2016	4/30/2017	EACH OCCURRENCE \$ 3,000,000
							DAMAGE TO RENTED PREMISES (Ea occurrence) \$ 1,000,000
							MED EXP (Any one person) \$ 5,000
							PERSONAL & ADV INJURY \$ 3,000,000
	GEN'L AGGREGATE LIMIT APPLIES PER:						GENERAL AGGREGATE \$ 4,000,000
	<input checked="" type="checkbox"/> POLICY <input type="checkbox"/> PRO-JECT <input type="checkbox"/> LOC						PRODUCTS - COMP/OP AGG \$ 3,000,000
B	<b>AUTOMOBILE LIABILITY</b>						
	<input checked="" type="checkbox"/> ANY AUTO			MWTB305706	1/1/2016	1/1/2017	COMBINED SINGLE LIMIT (Ea accident) \$ 3,000,000
	<input type="checkbox"/> ALL OWNED AUTOS						BODILY INJURY (Per person) \$
	<input type="checkbox"/> SCHEDULED AUTOS						BODILY INJURY (Per accident) \$
	<input checked="" type="checkbox"/> HIRED AUTOS						PROPERTY DAMAGE (Per accident) \$
	<input checked="" type="checkbox"/> NON-OWNED AUTOS						\$
	<input checked="" type="checkbox"/> MCS-90 Hired Physical Damage						\$
	<b>UMBRELLA LIAB</b>						
	<input type="checkbox"/> EXCESS LIAB						EACH OCCURRENCE \$
		<input type="checkbox"/> OCCUR					AGGREGATE \$
		<input type="checkbox"/> CLAIMS-MADE					\$
	DEDUCTIBLE						\$
	RETENTION \$						\$
B	<b>WORKERS COMPENSATION AND EMPLOYERS' LIABILITY</b>						
	ANY PROPRIETOR/PARTNER/EXECUTIVE OFFICER/MEMBER EXCLUDED? (Mandatory in NH)	Y/N	N/A	MWC30570500	1/1/2016	1/1/2017	<input checked="" type="checkbox"/> WC STATUTORY LIMITS <input type="checkbox"/> OTHER
	If yes, describe under DESCRIPTION OF OPERATIONS below						E.L. EACH ACCIDENT \$ 1,000,000
							E.L. DISEASE - EA EMPLOYEE \$ 1,000,000
C	Pollution Liability			EPC0197108-00	6/15/2016	4/30/2017	\$10,000,000 / \$10,000,000 claims made
C	Professional Liability			PEC5979843-13	4/30/2016	4/30/2017	\$5,000,000 / \$5,000,000

DESCRIPTION OF OPERATIONS / LOCATIONS / VEHICLES (Attach ACORD 101, Additional Remarks Schedule, if more space is required)

**CERTIFICATE HOLDER****CANCELLATION**

FOR BID PURPOSES ONLY

SHOULD ANY OF THE ABOVE DESCRIBED POLICIES BE CANCELLED BEFORE THE EXPIRATION DATE THEREOF, NOTICE WILL BE DELIVERED IN ACCORDANCE WITH THE POLICY PROVISIONS.

AUTHORIZED REPRESENTATIVE

Timothy Ayer/AMANDA

## **APPENDIX E**

### **SUPER STRUCTURE DEMOLITION ENGINEERING CONTROLS AND DECONTAMINATION**

Prior to super structure demolition a perimeter berm will be established to contain all demo debris and water/misting used for control. During demolition activities, upwind and downwind monitoring will be in place through use of two Nephelometers (real time hand held dust meters). For this dust monitoring, background dust levels will be established with no demolition activity on the site, and then 25% above those levels will be used as the action level to stop work and assess dust control. Also, no visible dust will be permitted beyond the boundary of the demolition area.

Additionally, a third party will be performing perimeter air monitoring for the Site to record airborne fiber concentrations during roof demolition, in compliance with a CT DPH approved work plan for asbestos containing material segregation during demolition.

All waste generated during super structure demolition will be stockpiled on the building foot print for waste categorization or decontamination prior to being removed from the site by Costello. Steel will be decontaminated per the attached STRUCTURAL STEEL DECONTAMINATION AND WIPE SAMPLING PLAN, dated November 7, 2016.





Revision 2 – November 7, 2016

### **STRUCTURAL STEEL DECONTAMINATION AND WIPE SAMPLING PLAN**

The following are the procedures that will be taken by Select Demo Services, LLC (SDS), and Costello Dismantling (CD) to decontaminate the structural steel from the former Century Enterprise Building in New Milford, Connecticut. This plan is proposed to satisfy Cleanup and Disposal Condition 13.a.ii.

1. Seal all floor drains or penetrations in the concrete slab in steel decontamination zone.
2. Establish a basin/berm around the perimeter of the steel decontamination zone using poly sheeting/EPDM and hay bales or dimensional lumber to contain decontamination rinseate.
3. An overspray barrier will be constructed along the perimeter of the steel decontamination zone in a manner that will allow any potential overspray from the decontamination activities to be collected.
4. Rinseate contained in the EPDM lined steel decontamination zone will be vacuumed or pumped into temporary storage containers (i.e. Drums and/or Totes).
5. All decontamination rinseate will be collected in temporary storage containers and staged inside the decontamination zone for sampling.
6. Decontamination rinseate will be sampled for PCB levels (Method EPA 608) as containers are filled.
  - a. Containers with water with PCB Concentrations  $>0.5$  ug/L will be removed from the site by vector truck and sent to Cyn Facility for treatment in accordance with 761.79.
  - b. Containers with water with PCB Concentrations less than or equal to  $0.5$  ug/L will have that water utilized for dust control of millings and disposal off site with millings as PCB Waste  $<50$  ppm in accordance with 761.79.
7. Ensure adequate safe distance of workers from demolition machinery and active demo areas and material processing areas.
8. All Workers entering the steel decontamination zone will don Level C PPE, inclusive of nitrile gloves, full face respirators, and water impervious suits with hoods.
9. Stockpiled steel will be lifted by Costello Heavy equipment for SDS workers, with HAZWOPER training, to wash down all surfaces of steel with low volume pressure washers.
10. Once washed down on all sides, the beams will be visually inspected by SDS, and placed on poly sheeting in approximately 20 TON piles with a 30' gap between adjacent steel actively being decontaminated to avoid cross contamination.
11. Care will be taken by CD operators to allow enough space for machine and personal access between piles, and also to stack piles in safe, low, and sound ways to prevent unanticipated beam movement.
12. The piles will be numbered and documented.
  - a. (Total volume of steel estimated at 2,400 TON for 120 discrete piles)
13. One standard wipe test (761.123) will be taken by SDS from each 20 TON pile, and labeled in accordance with numbered pile.

**One Delaware Drive Salem, NH 03079**

PH 603-893-5083 FX 603-893-5096



14. 3 Samples will be composited and this composite sample will represent 60 TON of decontaminated steel.
  - a. Total Composite Samples estimated to be 40, from 120 individual wipe tests (3 per composite).
15. The samples will be delivered on ice to EMSL in Cinnaminson, New Jersey.
16. Analysis of the samples will be 3 day TAT.
17. Currently EPA Conditions of approval (13.a.iii) require the submission of results to EPA for review. The intent of this decontamination and sampling plan submission is that if accepted the requirement for EPA review of sample results prior to shipment of steel will be removed and if sampling data is consistent as outlined below steel will be shipped immediately as data confirms it to be below the levels outlined in this plan.
18. Following analysis, samples shown to have less than 10 ug/300 cm<sup>2</sup> PCBs will release the 3 – 20 TON piles associated with that sample for recycling at selected scrap metal facility. (Schnitzer)
19. If a composite wipe test fails, then it will be re-washed and each 20 TON pile will be retested following additional decontamination with one standard wipe test (761.123).
20. Following analysis of 20 TON pile individual sample show to have less than 10 ug/100cm<sup>2</sup> will release the 20 TON pile associated with that sample for recycling at scrap metal facility.
21. This process will be repeated untill all of the steel has been washed, loaded and shipped off of the site for recycling.
22. In the event that a particular pile of steel has individual standard wipe test results exceeding 10 ug/100cm<sup>2</sup> after third wash down, the 20 TON pile of steel associated with that discrete sample will be disposed of as PCB Waste >50 ppm or EPA will be contacted if alteranative decontamination procedures will be presented for approval at that time.

**One Delaware Drive Salem, NH 03079**

PH 603-893-5083 FX 603-893-5096



## **Pilot Program Description & Wipe Sampling Analytical Results**

**One Delaware Drive Salem, NH 03079**

PH 603-893-5083 FX 603-893-5096





***Strategic Environmental Services, Inc.***

Corporate Headquarters

362 Putnam Hill Road  
Sutton, MA 01590

CT Office

128 Wildcat Road  
Burlington, CT 06013

(T): 508-757-7782 / (F-MA): 508-363-2346 / (F-CT): 860-673-2823

**www.Strategic-es.com**

October 20, 2016

Mike Costello  
Costello Dismantling  
45 Kings Hwy  
West Wareham, MA 02576

Re: New Milford CT; PCB Remediation Waste Pilot Study

Dear Mr. Costello,

SES developed a pilot study plan in regards to the PCB results from our sampling efforts on September 2, 2016 on the columns and September 19, 2016 on the trusses at Century Enterprises located at 12 Scovill Street, New Milford, CT. The purpose of the pilot study was to continue to compile additional data in an effort to develop a management plan for the steel structures associated with the site. It is believed that the source of PCB's on the steel structures is located within the settled dust on the surface of the steel structures. Based on the results of the first and second rounds of sampling, higher concentrations of PCB's were found in the trusses in comparison to the columns. This would be indicative of dust settling since it is more likely for dust to settle on horizontal surfaces than it would be on vertical surfaces.

The pilot study followed as below:

**Pilot Study for Trusses**

SES applied three different cleaning methods to the selected trusses. These cleaning methods were designed to mimic a large scale decontamination effort. The three different methods described below are Method 1, which is utilizing a HEPA vacuum to remove residual dust from the surfaces of the steel structures; Method 2, which is washing the surfaces to remove dust and collect rinseate to simulate power-washing; and Method 3, utilizing compressed air to remove dust from the surfaces with eventual collection of dust material from the floor area to simulate using an air knife. A section of the selected trusses were sampled prior to each cleaning method. The trusses were then cleaned according to the three different methods described below in 10 foot intervals and then resampled with single discrete samples.



## Strategic Environmental Services, Inc.

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The three pilot cleaning methods applied were as follows:

**Method 1:** Sample area was cleaned utilizing a HEPA vacuum to remove residual dust.

**Method 2:** Sample area was cleaned by washing area with clean water to remove residual dust.

**Method 3:** Sample area was cleaned utilizing compressed air to remove residual dust.

Sampling procedures for trusses were utilized as follows:

1. Selected areas were sampled using discreet sampling in three locations 10 feet apart.
2. Selected areas were cleaned according to each of the three cleaning methodologies.
3. Cleaned area was resampled utilizing discreet sampling.

### Results of Pilot Study on Trusses:

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
RT-03 (53.67)	Method 1	31.4	5.8
RT-03 (53.67)	Method 2	4.57	0
RT-03 (53.67)	Method 3	18.6	5.5

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
T3-T-05 (14.57)	Method 1	5.6	3.31
T3-T-05 (14.57)	Method 2	15.4	0
T3-T-05(14.57)	Method 3	11	6.5

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
PII-B4-04 (23.07)	Method 1	9.9	0
PII-B4-04 (23.07)	Method 2	8.1	1.93
PII-B4-04 (23.07)	Method 3	11.4	0.92

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
RT-06 (24.33)	Method 1	59.6	3.85
RT-06 (24.33)	Method 2	76.6	0.97
RT-06 (24.33)	Method 3	92.4	104.5

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
LSBS-T-03(10.27)	Method 1	91.3	8.8
LSBS-T-03(10.27)	Method 2	91.6	0.59
LSBS-T-03(10.27)	Method 3	58	21.5

Sample Location/ (Composite results in ug/100cm <sup>2</sup> )	Cleaning Method	Pre-Clean Results (ug/100cm <sup>2</sup> )	Post-Clean Results (ug/100cm <sup>2</sup> )
RT-05 (14.47)	Method 1	18.9	0.25
RT-05 (14.47)	Method 2	11.9	0
RT-05 (14.47)	Method 3	6.4	1.1



### **Pilot Study for Columns**

SES conducted a pilot study on two selected columns in order to determine the effectiveness of washing the columns as a means to reduce PCB concentrations believed to be found within the dust that had accumulated on vertical surfaces as well. Materials The selected columns were discreet sampled prior to washing. The columns were then washed and resampled.

Columns sampled are as follows:

- Column L-23 (SC-06)
- Truck Dock Column 3 (TDEA-02M)

### **Results of Washed Columns**

Sample Location/ (Composite results in ug/100cm2)	Cleaning Method	Pre-Clean Results (ug/100cm2)	Post-Clean Results (ug/100cm2)
SC-06 (20.27)	Water Wash	10.9	0
TDEA-02-M(16.13)	Water Wash	0.87	0

### **Discreet Sampling**

In addition to the pilot cleaning methods above, SES also resampled selected columns and trusses that were sampled in the first two rounds of sampling using discreet sampling for comparison to the composite wipe sampling results. The results are as follows:

### **Results of Discreet Sampling of Columns**

Column Sample Location	Results (ug/ 100 cm2)
SC-09-02	4.3
SC-05-02	0.68
BSLS-10M-2	1.37
T2-02	6.3
TDEA-03N-02	5.08





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**Results of Discreet Sampling of Trusses**

Truss Sample Location	Results (ug/ 100 cm2)
RT-01-02	6
T-3-T-01-2	3.6
T-3-T-02-2	1.45
T-4-T-02-2	69

**Summary**

All three cleaning methods specific to the trusses were effective in reducing PCB concentrations. A comparative analysis is presented below in order to classify the methods' effectiveness. The results of this analysis are reported as percent PCB concentration reduction for each method by comparing pre-cleaning sampling concentrations to post-cleaning sampling concentrations. All materials and PPE to conduct the testing were containerized and labelled. The results are as follows:

Method 1 (HEPA Vacuum)	Method 2 (Clean Water Wash)	Method 3 (Compressed Air)
84.17%	95.71%	55.99%

The clean water wash was the most effective at reducing PCB concentrations on the steel structures over HEPA Vacuuming and Compressed Air.

In regards to the column cleaning study, the clean water wash was 100% effective at removing detectable PCB concentrations from the sampling location.

Sincerely,

*Paul Saccente*

Paul Saccente

Cc: Ross Hartman